

**Preliminary Assessment Report
Caspian, Inc.
San Diego, California**

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**Prepared for:
U.S. Environmental Protection Agency
Region 9**

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LIST OF ACRONYMS

| | |
|----------|--|
| BGPS | Below Grade Processing Structures |
| bgs | below ground surface |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CERCLIS | Comprehensive Environmental Response, Compensation, and Liability Information System |
| DEH | County of San Diego, Department of Environmental Health |
| DTSC | Department of Toxic Substances Control |
| EPA | United States Environmental Protection Agency |
| HRS | Hazard Ranking System |
| LQG | Large Quantity Generator |
| mg/kg | milligrams per kilogram |
| NOT | Notice of Termination |
| NPL | National Priorities List |
| PA | Preliminary Assessment |
| PCE | Tetrachloroethylene |
| RCRAInfo | Resource Conservation and Recovery Act Information |
| RWQCB | Regional Water Quality Control Board |
| SARA | Superfund Amendments and Reauthorization Act |
| µg/l | micrograms per liter |
| UST | Underground Storage Tank |

1.0 INTRODUCTION

Under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), Weston Solutions, Inc. (WESTON®) has been tasked to conduct a Preliminary Assessment (PA) of the Caspian, Inc. (Caspian) site, located in San Diego, San Diego County, California.

The purpose of the PA is to review existing information on the site and its environs, to assess the threat(s), if any, posed to public health, welfare, or the environment, and to determine if further investigation under CERCLA/SARA is warranted. The scope of the PA includes the review of information available from federal, state, and local agencies and performance of an on-site reconnaissance visit.

Using the sources of existing information, the site is then evaluated using the U.S. Environmental Protection Agency's (EPA's) Hazard Ranking System (HRS) criteria to assess the relative threat associated with actual or potential releases of hazardous substances at the site. The HRS has been adopted by the EPA to help set priorities for further evaluation and eventual remedial action at hazardous waste sites. The HRS is the primary method of determining a site's eligibility for placement on the National Priorities List (NPL). The NPL identifies sites at which the EPA may conduct remedial response actions. This report summarizes the findings of these preliminary investigative activities.

The Caspian site was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on February 12, 2009 (EPA ID No.: CAD053851366) (EPA, 2010b).

More information about the Superfund program is available on the EPA web site at <http://www.epa.gov/superfund>. The attached fact sheet describes EPA's site assessment process (Appendix F).

1.1 Apparent Problem

The apparent problems at the site, which contributed to EPA's determination that a PA was necessary, are as follows:

- The site operated as a chemical milling facility, primarily for aircraft components, from 1965 until 2005 when operations ceased. The facility contained process tanks that contained acids, solvents, and metals. Samples collected in the vicinity of these tanks indicated a release to the soils (Caspian, 1999a, DEH, 2005).

2.0 SITE DESCRIPTION

2.1 Location

The Caspian site is located at 4951 Ruffin Road, San Diego, San Diego County, California. The geographic coordinates of the site are 32° 49' 38.13" North latitude and 117° 07' 36.85" West longitude (EPA, 2010b; Appendix D). The location of the site is shown in Figure 1.

2.2 Site Description

The Caspian site occupies approximately eight acres in the City of San Diego. The site is located at 4951 Ruffin Road between Balboa Avenue and Clairmont Mesa Boulevard. The site is located on a western bluff overlooking Murphy Canyon. The site is surrounded by business parks and is currently occupied by a production studio (Caspian, 1999a; Appendix B).

During its operation, Caspian maintained twelve buildings. Building #1 was an assembly area where aluminum component parts were attached to aluminum stringers. Building #2 was an area where waterborne maskant coatings were applied to small aluminum test panels. Building #3 was a quality control, scribing, and painting area. A paint booth and oven were used in this building. Building #4 was a benching area. Aluminum parts were routed and benched in this building. Equipment in this building included routing machines, various types of milling equipment, hand held grinders and saws. Building #5 was a large building designated for the application of waterborne spray coatings to large aerospace skins and component parts. Spray equipment and limited storage of the waterborne maskant was stored in this building. Building #6 was a laboratory where chemical analysis was performed for the milling tanks as well as research and development of new waterborne products. Numerous chemicals and laboratory equipment were stored in this building. Small aluminum and titanium coupons were coated in this area for evaluation of new products. Building #7 was the maintenance building. Building #8 was the routing building. Aluminum stringers were routed in this building. Equipment used in this building included routing tables and aluminum parts. Building #9 was the waterborne maskant production area. This building consisted of various chemicals used in manufacturing the maskant. Various mixers, tanks, pumps, and a 6,000 gallon dip tank containing waterborne maskant occupied this building. Building #10 was a sheet metal manufacturing shop that consisted of press breaks, shears, mills, punch presses, and drill presses. Various aerospace component parts were produced in this area. Building #11 was the shipping and receiving area as well as the storage of large aerospace component parts. Building "S" served as the main office for Caspian (Caspian, 1999a). A site layout is shown in Figure 2.

The site also had an outside chemical milling processing area. This area contained four large chemical milling tanks which contained a sodium hydroxide mixture. There were four deoxidizer tanks that contained a dilute nitric acid solution. There were also two tanks used for the chemical milling of titanium/steel parts. These tanks contained hydrofluoric and nitric acid solution. Two

steam boilers were also located in this area. The entire area was uncovered but was paved and surrounded by a berm (Caspian, 1999a).

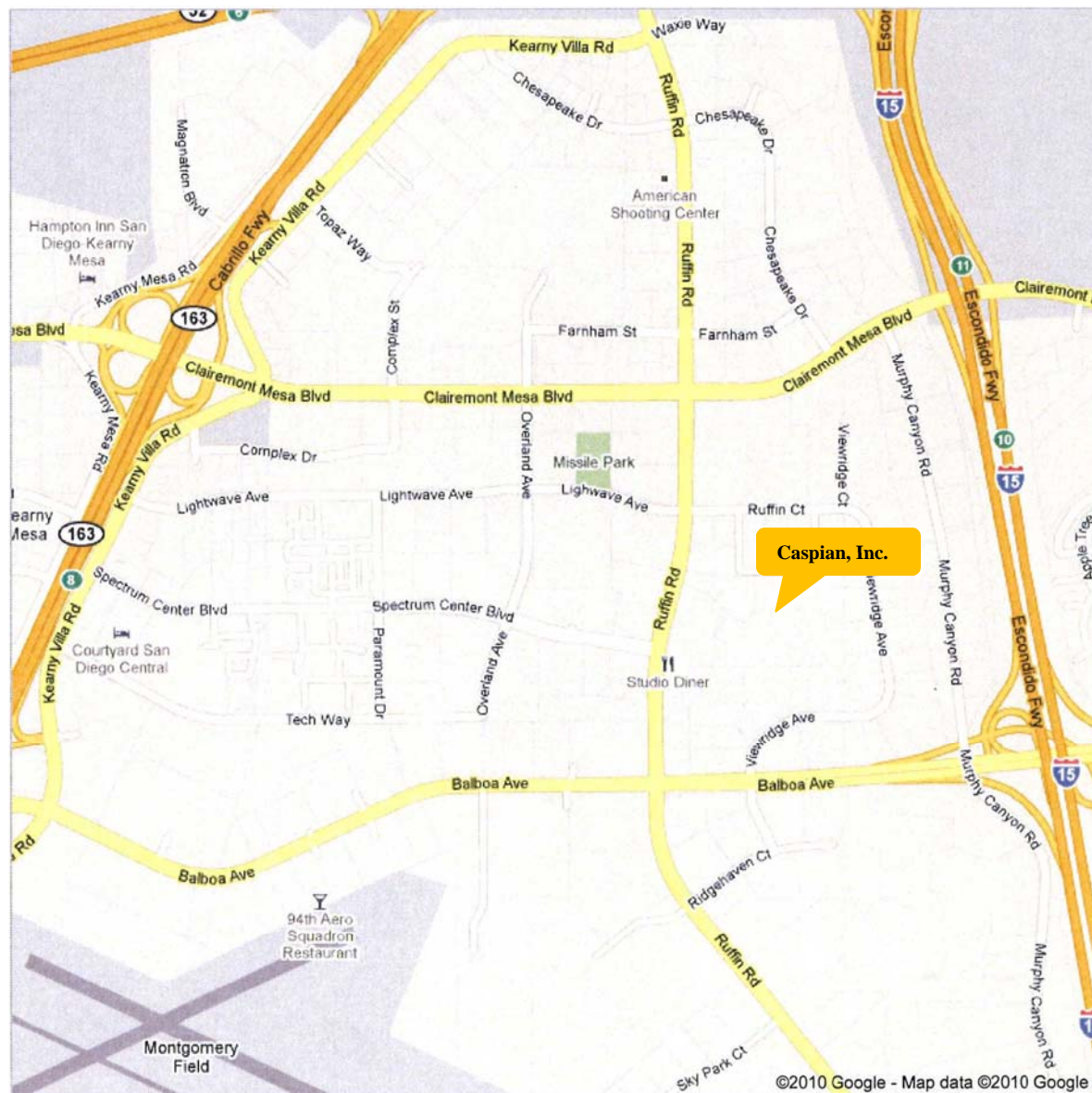
Caspian operated four below grade processing structures (BGPS). These BGPS were permanently closed in 1996 under the direction of the San Diego Department of Environmental Health (Caspian, 1999a; Booth, 1997).

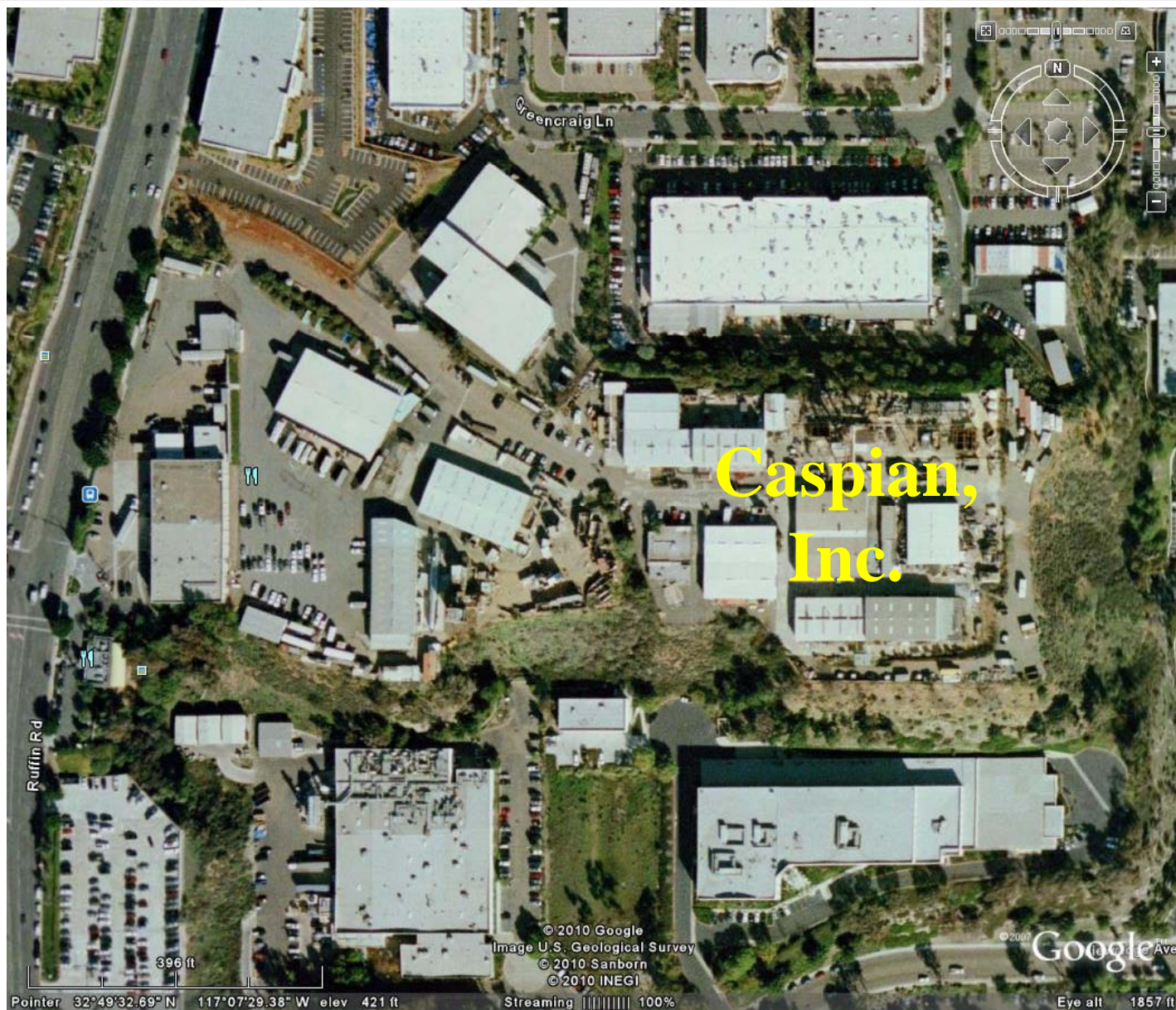
In addition, Caspian operated twelve aboveground tanks. All of these tanks were in bermed areas. No additional information on the contents of these tanks or when they were inactivated was available (Caspian, 1999a).

2.3 Operational History

Caspian occupied the site from 1965 until 2005 when operations ceased. Caspian operated as a chemical milling facility, primarily for aircraft components. They performed a service for the aerospace industry whereby excess weight was removed from aerospace and missile component parts without affecting the structural integrity of the component. Prior to 1986 the site operated under the name of Chemical Energy of California. It appears the site has been owned by Elkhorn Ranch, Inc. and leased to Cyrus Jaffari of Caspian, Inc. from 1965 until 2005 (Collins, 1986, DEH, 2005, RWQCB, Caspian, 1999a).

The site is currently occupied by a working production studio (Appendix B).





Caspian, Inc.
4951 Ruffin Road
San Diego, California
Preliminary Assessment Report

Figure 2:
Site Layout

2.4 Regulatory Involvement

Requests for information were made to agencies that could potentially be involved with the Caspian site. The Regional Water Quality Control Board (RWQCB), the Department of Toxic Substances Control (DTSC) San Diego office, and the County of San Diego Department of Environmental Health (DEH) were contacted. Details of these agencies' involvement are presented below (Appendix C-1, C-2, and C-3).

2.4.1 U.S. Environmental Protection Agency

The Caspian site is listed in the Resource Conservation and Recovery Act Information (RCRAInfo) database, as a large quantity generator (LQG) (EPA, 2010c).

2.4.2 Department of Toxic Substances Control

On June 2, 2003 and July 24, 2003, the DTSC conducted inspections of the Caspian site. The inspections were conducted to investigate the waste stream process at the site. No violations were discovered (Appendix C-1; DTSC, 2003).

2.4.3 Regional Water Quality Control Board

On April 5, 1971 the San Diego Regional Water Quality Control Board (RWQCB) ordered Chemical Energy of California (Caspian), to cease the discharge of soluble industrial waste to the ground and surface waters of the San Diego River Basin. When the RWQCB conducted another inspection of the site they noted the majority of the waste was being contained, however runoff was noted on the south side of the site. The runoff discharged to a canyon on the south side of the site and consisted of a green rubber coating material used to protect assembled parts. The RWQCB ordered Caspian to develop a plan detailing how it would eliminate future discharges. The only plan available was a 1992 Storm Water Pollution Prevention Plan and Best Management Practices Plan. The plan addressed potential contaminants located at the site and strategies implemented to prevent future spills (RWQCB).

Annual Storm Water Reports were available at the San Diego RWQCB as far back as 1992. Reports reviewed indicated releases of contaminants during various years. The highest releases are as follows; toluene at concentrations of 0.78 micrograms per liter (ug/l) in 1993, 0.98 ug/l in 1996, and 9.0 ug/l in 1997. Tetrachloroethylene (PCE) was also detected at a maximum concentration of 0.32 ug/l in 1997 (Appendix C-2).

Caspian issued a Notice of Termination (NOT) for their Storm Water Permit on September 20, 2005. The NOT was approved on July 18, 2006 by the RWQCB (Appendix C-2).

2.4.4 County of San Diego Department of Environmental Health (DEH)

Records reviewed indicated the DEH has been involved at the Caspian site since 1983. Caspian submitted a Hazardous Materials Management Permit Application to DEH on June 21, 1983 (DEH, 1983).

On May 31, 1984 DEH conducted an inspection of the Caspian site and issued violations for soil contamination. Soil contamination was caused by dragout from dip tanks and a pipe from a sump discharging directly to the ground. Caspian was ordered to properly remove the contaminated soil and conduct monitoring procedures to prevent future releases. All violations were properly remedied by September 12, 1984 (DEH, 1984).

On July 14, 1987, Caspian issued payment for Permits To Operate Underground Storage Tanks (USTs). The site contained four USTs that Caspian referred to as below-grade process structures, (BGPS #14, 15, 81, and Maskant). Because Caspian did not believe their BGPSs were USTs a monitoring plan was never implemented for the BGPS. BGPS #81 contained a mixture of hydrofluoric acid, nitric acid, and titanium. In 1985 a crack in this tank was identified. The Maskant tank contained kraton, talc, PCE, 1,1,1-trichloroethane, and butyl alcohol. BGPS #14 contained sodium hydroxide, sodium aluminate, and sodium sulfide. BGPS #15 contained sodium hydroxide, sodium aluminate, sodium sulfide, and triethanolamine (Caspian, 1999b; Quinlan, 1992).

In 1991 thirteen soil borings were drilled in the vicinity of the four USTs. The samples were analyzed for constituents known to have been present in the USTs, including fluoride, nitrate, sulfide, total butanol, PCE, triethanolamine, and pH. Analytical results indicated PCE was present in onsite soils near the Maskant tank, with concentrations ranging from 0.14 mg/kg to 190 mg/kg in samples collected at a sample depth of 10 feet. In March 1992, an additional four soil borings adjacent to the Maskant tank were drilled. These soils were analyzed for total butanol, PCE, titanium, and pH. The process solutions from the USTs were removed on different dates between 1986 and 1990. The USTs were closed in place in May 1996 under the DEH's approval. There is no indication that contaminated soils were removed (Quinlan, 1992).

On April 12, 1990 wet sludge with a greenish tint was observed ponding along the curb north of the Alodine process tanks and flowing directly into a sewer drain. The sludge was sampled and found to contain 6,980 milligrams per kilogram (mg/kg) of chromium, 253 mg/kg of copper, 295 mg/kg of lead, and 8.1 mg/kg of cadmium. In 1991 soil samples were taken beneath the Alodine tanks. Analytical results indicated chromium present in concentrations ranging from 9.2 mg/kg (one foot below ground surface) to 73.6 mg/kg (two feet below ground surface). Criminal charges by the District Attorney's Office were charged. Caspian pled guilty and paid fines to felony violations of both Health and Safety Code Section 25189.5 (a) (b) and Water Code Section 13387 (c). On October 1, 1992 Caspian submitted a Storm Water Pollution Prevention Plan and Best Management Practices Plan to the RWQCB. The plan addressed potential contaminants located at the site and strategies

implemented to prevent future spills. A report documenting soil removal could not be located (Caspian, 1999a; Haynie, 1990a, Miller, 1991, Collins, 1992).

In a letter dated October 2, 1990, Caspian indicated that a number of containers were buried on the southeast corner of the site in 1971 or 1972. Thirty containers, previously containing hydrofluoric acid, were buried under two feet of soil on the site. Caspian indicated these drums had been rinsed prior to being buried. Soon after their presence was identified the drums were excavated and removed from their buried location. On February 19, 1991 six soil samples from the excavated area were collected at depths ranging from zero to six inches below ground surface (bgs). In addition, four samples were collected from the stockpiled soil associated with the excavation. The samples were analyzed for pH and total fluoride and five of the soil samples were analyzed for total metals. Chromium was detected in soil samples ranging in concentrations of 13.7 mg/kg to 18.8 mg/kg. Chromium was detected in the stockpiled soil in concentrations ranging from 12.0 mg/kg to 15.2 mg/kg. On June 20, 1991 the DEH determined the levels of pH, fluoride, and total metals in the soils to be within acceptable levels and allowed the excavated soil to be returned to the excavation (Haynie, 1990b, Carlisle, 1991, DEH, 1991).

On September 7, 2005 DEH received a closure letter from Caspian. The DEH requested that the drums, totes, and tanks still remaining on the site during an October 4, 2005 be properly closed. On December 12, 2005 Caspian issued the requested tank closure certifications and manifest to the DEH. On April 14, 2006 the DEH conducted a final inspection of the site and recommended the permit be inactivated (DEH, 2005; Caspian, 2005; DEH, 2006).

3.0 HAZARD RANKING SYSTEM FACTORS

3.1 Sources of Contamination

For HRS purposes, a source is defined as an area where a hazardous substance has been deposited, stored, disposed, or placed, plus those soils that have become contaminated from migration of a hazardous substance.

Potential hazardous substance sources associated with the Caspian site include, but may not be limited to:

- Soils contaminated by chromium and solvents from historical operations as a chemical milling facility. Elevated concentrations of chromium and PCE were detected in on-site soils. There is no evidence that these soils were removed (Caspian, 1999b; Quinlan, 1992; Haynie, 1990a, Collins, 1992).

3.2 Groundwater Pathway

In determining a score for the groundwater migration pathway, the HRS evaluates: 1) the likelihood that sources at a site actually have released, or potentially could release, hazardous substances to groundwater; 2) the characteristics of the hazardous substances that are available for a release (i.e., toxicity, mobility, and quantity); and 3) the people (targets) who actually have been, or potentially could be, impacted by the release. For the targets component of the evaluation, the HRS focuses on the number of people who regularly obtain their drinking water from wells that are located within 4 miles of the site. The HRS emphasizes drinking water usage over other uses of groundwater (e.g., food crop irrigation and livestock watering), because, as a screening tool, it is designed to give the greatest weight to the most direct and extensively studied exposure routes.

The Caspian site is underlain by near shore deposits of the Linda Vista Formation. Sediments logged during a sampling event indicate silty sands that extend to depths of approximately 15-20 feet bgs with the upper 5-10 feet containing cobbles. The sediments below the silty sands were logged as a cobble conglomerate with a silty sand matrix that extends to approximately 30-35 feet bgs. It is believed the sediments are part of the Poway Group, including the Stadium Conglomerate. The sediments below the cobble conglomerate were logged as silty sand or sandy silt to the total depth explored of 81 feet. These sediments may be Friars Formation. With the exception of a few thin lenses of well sorted sand, all of the sediments described in the lithologic logs would be expected to be relatively low permeability. Depth to groundwater beneath the site area is unknown but estimated to be greater than 81 feet bgs (Caspian, 1999b; Kennedy, 1975).

There are no drinking water wells within a 4 mile radius of the Caspian site. (EPA, 2010a).

3.3 Surface Water Pathway

In determining the score for the surface water pathway, the HRS evaluates: 1) the likelihood that sources at a site actually have released, or potentially could release, hazardous substances to surface water (e.g., streams, rivers, lakes, and oceans); 2) the characteristics of the hazardous substances that are available for a release (i.e., toxicity, persistence, bioaccumulation potential, and quantity); and 3) the people or sensitive environments (targets) who actually have been, or potentially could be, impacted by the release. For the targets component of the evaluation, the HRS focuses on drinking water intakes, fisheries, and sensitive environments associated with surface water bodies within 15 miles downstream of the site.

There are no known surface water bodies within two miles of the site. The Alvarado Treatment Plant is within four miles of the site but it appears to be a surface water runoff treatment plant. (Appendix B).

3.4 Soil Exposure and Air Pathways

In determining the score for the soil exposure pathway, the HRS evaluates: 1) the likelihood that there is surficial contamination associated with the site (e.g., contaminated soil that is not covered by pavement or at least 2 feet of clean soil); 2) the characteristics of the hazardous substances in the surficial contamination (i.e., toxicity and quantity); and 3) the people or sensitive environments (targets) who actually have been or potentially could be, exposed to the contamination. For the targets component of the evaluation, the HRS focuses on populations that are regularly and currently present on or within 200 feet of surficial contamination. The four populations that receive the most weight are residents, students, daycare attendees, and terrestrial sensitive environments.

In determining the score for the air migration pathway, the HRS evaluates: 1) the likelihood that sources at a site actually have released, or potentially could release, hazardous substances to ambient outdoor air; 2) the characteristics of the hazardous substances that are available for a release (i.e., toxicity, mobility, and quantity); and 3) the people or sensitive environments (targets) who actually have been, or potentially could be, impacted by the release. For the targets component of the evaluation, the HRS focuses on regularly occupied residences, schools, and workplaces within 4 miles of the site. Transient populations, such as customers and travelers passing through the area, are not counted.

There are no residences, schools, daycare centers, or sensitive environments on site. Portions of the site appear to be unpaved (Appendix B).

4.0 EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40CFR 300.415 (b) (2)] authorizes the EPA to consider emergency response actions at those sites that pose an imminent threat to human health or the environment. For the following reasons, a referral to Region 9's Emergency Response Office does not appear to be necessary:

- The County of San Diego conducted a final inspection of the site in 2006, found the site properly closed and recommended Caspian's permit be inactivated (DEH, 2006).

5.0 SUMMARY

The Caspian site is located at 4951 Ruffin Road in San Diego, San Diego County, California. The site is located on a bluff overlooking Murphy Canyon and occupies approximately eight acres. The site is surrounded by business parks and is currently occupied by a production studio. The number of buildings still present at the facility is unknown but during operation the site consisted of twelve buildings. The majority of the site is paved but there are unpaved portions throughout the site.

On May 7, 1991 Caspian pled guilty and paid fines to felony violations of both Health and Safety Code Section 25189.5 (a) (b) and Water Code Section 13387 (c) due to the April 12, 1990 release of a wet sludge with a greenish tint flowing directly into a sewer drain. The sludge was sampled and found to contain 6,980 milligrams per kilogram (mg/kg) of chromium, 253 mg/kg of copper, 295 mg/kg of lead, and 8.1 mg/kg of cadmium. In 1991 soil samples were taken beneath the Alodine tanks. Analytical results indicated chromium present in concentrations ranging from 9.2 mg/kg (one foot below ground surface) to 73.6 mg/kg (two feet below ground surface). A report documenting soil removal could not be located.

In 1990, thirty drums previously containing hydrofluoric acid were discovered buried under two feet of soil on the Caspian site. The drums were excavated and removed from their buried location. On February 19, 1991 six soil samples from the excavated area were collected at depths ranging from zero to six inches bgs. In addition, four samples were collected from the stockpiled soil associated with the excavation. The samples were analyzed for pH and total fluoride and five of the soil samples were analyzed for total metals. Chromium was detected in soil samples ranging in concentrations of 13.7 mg/kg to 18.8 mg/kg. Chromium was detected in the stockpiled soil in concentrations ranging from 12.0 mg/kg to 15.2 mg/kg. On June 20, 1991 the County of San Diego, Department of Environmental Health (DEH) determined the levels of pH, fluoride, and total metals in the soils to be within acceptable levels and allowed the excavated soil to be returned to the excavation.

The site contained four USTs that Caspian refers to as below-grade process structures, (BGPS #14, 15, 81, and Maskant). Because Caspian did not believe their BGPS were USTs a monitoring plan was never implemented for the BGPS. BGPS #81 contained a mixture of hydrofluoric acid, nitric acid, and titanium. In 1985 a crack in this tank was identified. The Maskant tank contained kraton, talc, PCE, 1,1,1-trichloroethane, and butyl alcohol. BGPS #14 contained sodium hydroxide, sodium aluminate, and sodium sulfide. BGPS #15 contained sodium hydroxide, sodium aluminate, sodium sulfide, and triethanolamine. In 1991 thirteen soil borings were drilled in the vicinity of the four USTs. Analytical results indicated PCE was present in onsite soils near the Maskant tank, with concentrations ranging from 0.14 mg/kg to 190 mg/kg in samples collected at a sample depth of 10 feet. In March 1992, an additional four soil borings adjacent to the Maskant tank were drilled. These soils were analyzed for total butanol, PCE, titanium, and pH. The process solutions from the USTs were removed on different dates between 1986 and 1990. The USTs were closed in place in May 1996 under the DEH's approval. There is no indication that contaminated soils were removed

The following pertinent Hazard Ranking System factors are associated with the site:

- Chromium and PCE were detected in soils near processing tanks. There is no indication these soils were removed.
- Depth to groundwater beneath the site is unknown but suspected to be greater than 81 feet in the vicinity of the site. There are no drinking water wells located within 4 miles of the site.

- There are no known drinking water intakes, fisheries, or sensitive environments within the target distance limit from the site.
- There are no residences, schools, daycare centers, or sensitive environments on site. The site is completely fenced and predominately paved. The site is occupied by a working production studio.

6.0 REFERENCE LIST

Booth, 1997; H. Willis booth, III, Elkhorn Ranch, Inc.; Letter to County of San Diego, Department of Environmental Health Hazardous Materials Management, April 15, 1997.

Carlisle, 1991; Craig L. Carlisle, Applied Geosciences, Inc.; Letter Report Presenting Results of Stockpile and Excavation Soil Sampling at 4951 Ruffin Road, San Diego, CA, March 15, 1991.

Caspian, 1999a; Caspian, Inc., Storm Water Pollution Prevention Plan and Best Management Practices, July 19, 1999.

Caspian, 1999b; Caspian, Inc., Site Assessment Summary, September 7, 1999.

Caspian, 2005; Caspian, Inc. Letter to County of San Diego, December 12, 2005.

Collins, 1986; Caspian, Inc. Letter to County of San Diego, re: Chemical Energy of California, December 31, 1986.

Collins, 1992; Caspian, Inc. Letter to County of San Diego, Department of Health Services, Hazardous Materials Management Division, February 13, 1992.

DEH, 1983; County of San Diego, Department of Environmental Health, Hazardous Materials Management Permit Application, May, 31, 1983.

DEH, 1984; County of San Diego, Department of Environmental Health, Official Notice Inspection Report, May 31, 1984.

DEH, 1991; County of San Diego, Department of Environmental Health, Hazardous Materials Management Division, Letter to Caspian, Inc. re: Site Assessment Investigation, June 20, 1991.

DEH, 2005; County of San Diego, Department of Environmental Health, Letter to Caspian, Inc., re: Closure of Caspian and Malek Facilities Located at 4951 Ruffin Road, San Diego, October 13, 2005.

DEH, 2006; County of San Diego, Department of Environmental Health, Compliance Inspection Report, April 14, 2006.

DTSC, 2003; California Department of Toxic Substances Control, letter to Caspian Incorporated, August 29, 2003.

EPA, 2010a; U.S. Environmental Protection Agency (EPA), GIS Report, Caspian, Inc., June 7, 2010.

Note: This document is confidential and is included in the confidential information packet.

EPA, 2010b; U.S. Environmental Protection Agency, Superfund Information Systems, Superfund Site Information, <http://cfpub.epa.gov/supercpad/cursites/srchsites.cfm>, accessed May 24, 2010.

EPA, 2010c; U.S. Environmental Protection Agency, Resource Conservation and Recovery Act (RCRAInfo), http://www.epa.gov/enviro/html/rcris/rcris_query_java.html, data extracted July 13, 2010.

Garrett, 1986; Christopher W. Garrett, Latham & Watkins, letter to County of San Diego, re: Chemical Energy Co.'s Application for Permit to Operate Underground Storage Tanks, May, 1, 1986.

Haynie, 1990a; Allen D. Haynie, Latham & Watkins, letter to County of San Diego, re: Caspian Inc. at 4951 Ruffin Road, San Diego, September 26, 1990.

Haynie, 1990b; Allen D. Haynie, Latham & Watkins, letter to County of San Diego, re: Caspian Inc. at 4951 Ruffin Road, San Diego, October 2, 1990.

Miller, 1991; Edwin L. Miller, JR., Office of the District Attorney, County of San Diego, re: People v Caspian, Court Number F138739, May 8, 1991.

Quinlan, 1992; Peter T. Quinlan, Dukek & Associates, Inc., Transmittal of Results of Subsurface Investigation at the Caspian Inc. Facility, September 21, 1992.

RWQCB; California Regional Water Quality Control Board, Order No. 87-106, no date provided.

Appendix A:

Transmittal List

TRANSMITTAL LIST

Date: July 26, 2010
Site Name: Caspian, Inc.
EPA ID No.: CAD053851366

A copy of the Preliminary Assessment Report for the above-referenced site should be sent to the following:

Elkhorn Ranch, Inc (property owner)
P.O. box 2164
Julian, California 92036

Greg Holmes
CA Environmental Protection Agency
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, CA 90630

Appendix B:

**Site reconnaissance Interview and Observation
Report/Photographic Documentation**

SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

DATE: July 1, 2010

OBSERVATIONS MADE BY: Anitra B. Rice

SITE: Caspian, Inc.

EPA ID: CAD053851366

A Site reconnaissance visit was conducted on July 1, 2010. The following information was obtained and photographs were taken:

The Caspian, Inc. site (Site) is located at 4951 Ruffin Road, San Diego, California. The Site is on top of a bluff and situated off Ruffin Road down a long paved driveway. The Site is completely fenced, guarded by security personnel, and inaccessible to the public. Several employees were observed in the Site.

The Site is bounded to the north by a business park, to the south by a restaurant, and to the west by Ruffin Road. The east side of the Site was inaccessible.

It is unclear where storm water run-off flows to. No schools or daycares were observed on or in the vicinity of the Site.



Photo 1: View of Site's paved driveway from Ruffin Road (facing east).



Photo 2: View of studio entrance.



Photo 3: Eastern view of the Site from property to the south of the Site.

Appendix C:

Contact Reports

CONTACT REPORT #1

| | | |
|---|------------------------------|-----------------------|
| AGENCY/AFFILIATION: Department of Toxics Substances Control | | |
| DEPARTMENT: Records | | |
| ADDRESS/CITY: 9174 Sky Park Court, Suite 150 | | |
| COUNTY/STATE/ZIP: San Diego, California 92123 | | |
| CONTACT(S) | TITLE | PHONE |
| Cleo Munoz | Regional Records Coordinator | (858) 637-5531 |
| PERSON MAKING CONTACT: Anitra Rice | | DATE: 6/01/10 |
| SUBJECT: File Review | | |
| SITE NAME: Caspian, Inc. | | EPA ID#: CAD053851366 |

Records are available for the site. Files will be faxed.

CONTACT REPORT #2

| | | |
|---|--------------------------------------|-----------------------|
| AGENCY/AFFILIATION: California Regional Water Quality Control Board | | |
| DEPARTMENT: Records | | |
| ADDRESS/CITY: 9174 Sky Park Court, Suite 100 | | |
| COUNTY/STATE/ZIP: San Diego, California 92123-4340 | | |
| CONTACT(S) | TITLE | PHONE |
| Troy Souther | Regional Board Management Officer | (858) 467-2799 |
| PERSON MAKING CONTACT: Anitra Rice | | DATE: 6/30/10 |
| SUBJECT: File Review | | |
| SITE NAME: Caspian, Inc. | | EPA ID#: CAD053851366 |

Records were available for the site. Files reviewed indicated the following information:

Annual Storm Water Reports were available at the RWQCB as far back as 1992. Reports reviewed indicated a release of toluene at concentrations of 0.78 micrograms per liter (ug/l) in 1993, 0.98 ug/l in 1996, and 9.0 ug/l in 1997. Tetrachloroethylene was also detected at a concentration of 0.32 ug/l in 1997.

A Notice of Termination (NOT) was issued on September 20, 2005. The NOT was approved on July 18, 2006 by the RWQCB.

CONTACT REPORT #3

| | | |
|--|---------------------------|-----------------------|
| AGENCY/AFFILIATION: County of San Diego Department of Environmental Health | | |
| DEPARTMENT: Records | | |
| ADDRESS/CITY: P.O. Box 129261 | | |
| COUNTY/STATE/ZIP: San Diego, California 92112-9261 | | |
| CONTACT(S) | TITLE | PHONE |
| Joyce Ellman | Office Support Specialist | (619) 338-2268 |
| PERSON MAKING CONTACT: Anitra Rice | | DATE: 6/2/10 |
| SUBJECT: File Review | | |
| SITE NAME: Caspian, Inc. | | EPA ID#: CAD053851366 |

Records are available for the site. Files will be emailed.

Appendix D:

Latitude and Longitude Calculations Worksheet

Latitude and Longitude Calculation Worksheet (7.5' quads) Using an Engineer's Scale (1/50)

Site Name CERCLIS #

AKA

Address

City State ZIP

Site Reference Point

USGS Quad Name Scale

Township Range Section $\frac{1}{4}$ $\frac{1}{4}$ $\frac{1}{4}$

Map Datum ☐ 1927 ☐ 1983 (Check one) Meridian

Map coordinates at southeast corner of 7.5' quadrangle (attach photocopy)

Latitude ° ' "N Longitude ° ' "W

Map coordinates at southeast corner of 2.5' grid cell

Latitude ° ' "N Longitude ° ' "W

Calculations

LATITUDE(x)

A) Number of ruler graduations between 2.5' (150") grid lines (a)

B) Number of ruler graduations between south grid line and the site reference point (b)

C) Therefore, $a/150 = b/x$, where **x = Latitude in decimal seconds, north of the south grid line**

Expressed as minutes and seconds ($1' = 60''$) = ° ' "N

Add to grid cell latitude = ° ' "N + ° ' "N

Site latitude = 3 2 ° 4 9 ' 3 8 "N

LONGITUDE(y)

A) Number of ruler graduations between 2.5' (150") grid lines (a)

B) Number of ruler graduations between south grid line and the site reference point (b)

C) Therefore, $a/150 = b/x$, where **x = Longitude in decimal seconds, west of the east grid line**

Expressed as minutes and seconds ($1' = 60''$) = ° ' "W

Add to grid cell longitude = ° ' "N + ° ' "N

Site longitude = 1 1 7 ° 0 7 ' 3 6 "W

APPENDIX F:
EPA Quick Reference Fact Sheet



SITE ASSESSMENT: Evaluating Risks at Superfund Sites

Office of Emergency and Remedial Response
Hazardous Site Evaluation Division 5204G

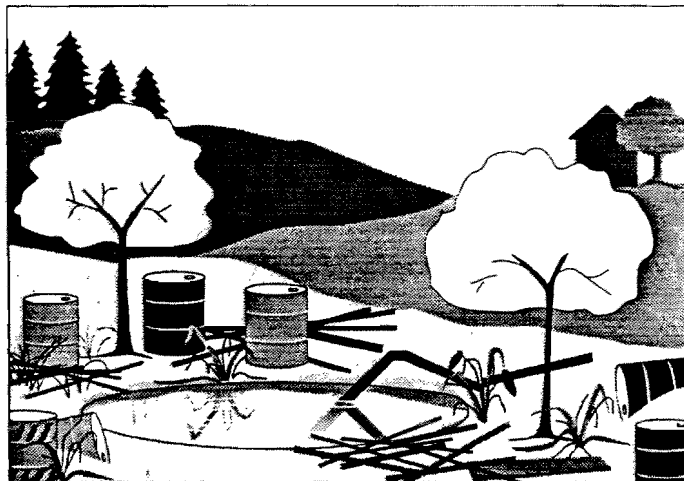
Quick Reference Fact Sheet

The Challenge of the Superfund Program

A series of headline-grabbing stories in the late 1970s, such as Love Canal, gave Americans a crash course in the perils of ignoring hazardous waste. At that time, there were no Federal regulations to protect the country against the dangers posed by hazardous substances (mainly industrial chemicals, accumulated pesticides, cleaning solvents, and other chemical products) abandoned at sites throughout the nation. And so, in 1980 Congress passed the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, to address these problems.

The major goal of the Superfund program is to protect human health and the environment by cleaning up areas, known as "sites," where hazardous waste contamination exists. The U.S. Environmental Protection Agency (EPA) is responsible for implementing the Superfund program.

At the time it passed the Superfund law, Congress believed that the problems associated with uncontrolled releases of hazardous waste could be



handled in five years with \$1.6 billion dollars. However, as more and more sites were identified, it became apparent that the problems were larger than anyone had originally believed. Thus, Congress passed the Superfund Amendments and Reauthorization Act (SARA) in 1986. SARA expanded and strengthened the authorities given to EPA in the original legislation and provided a budget of \$8.5 billion over five years. Superfund was extended for another three years in 1991.

What is EPA's Job at Superfund Sites?

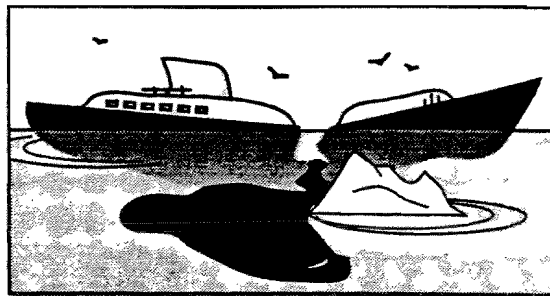
For more than 10 years, EPA has been implementing the Superfund law by:

- ☛ Evaluating potential hazardous waste sites to determine if a problem exists;
- ☛ Finding the parties who caused the hazardous waste problems and directing them to address these problems under EPA oversight or requiring them to repay EPA for addressing these problems; and
- ☛ Reducing immediate risks and tackling complex hazardous waste problems.

The Superfund site assessment process generally begins with the discovery of contamination at a site and ends with the completion of remediation (i.e., cleaning up the waste at a site) activities. This fact sheet explains the early part of the process, called the *site assessment* phase.

The National Response Center

The National Response Center (NRC), staffed by Coast Guard personnel, is the primary agency to contact for reporting all oil, chemical, and biological discharges into the environment anywhere in the U.S. and its territories. It is responsible for:



- Maintaining a telephone hotline 365 days a year, 24 hours a day;
- Providing emergency response support in specific incidents; and
- Notifying other Federal agencies of reports of pollution incidents.

To report a pollution incident, such as an oil spill, a pipeline system failure, or a transportation accident involving hazardous material, call the NRC hotline at **800-424-8802**.

1

Site
Discovery

Hazardous waste sites are discovered in various ways. Sometimes concerned residents find drums filled with unknown substances surrounded by dead vegetation and call the NRC, EPA, or the State environmental agency; or an anonymous caller to the NRC or EPA reports suspicious dumping activities. Many sites come to EPA's attention through routine inspections conducted by other Federal, State, or local government officials. Other sites have resulted from a hazardous waste spill or an explosion. EPA enters these sites into a computer system that tracks any future Superfund activities.

2

Preliminary
Assessment

After learning about a site, the next step in the site assessment process is to gather existing information about the site. EPA calls this the *preliminary assessment*. Anyone can request that a preliminary assessment be performed at a site by petitioning EPA, the State environmental agency, local representatives, or health officials.

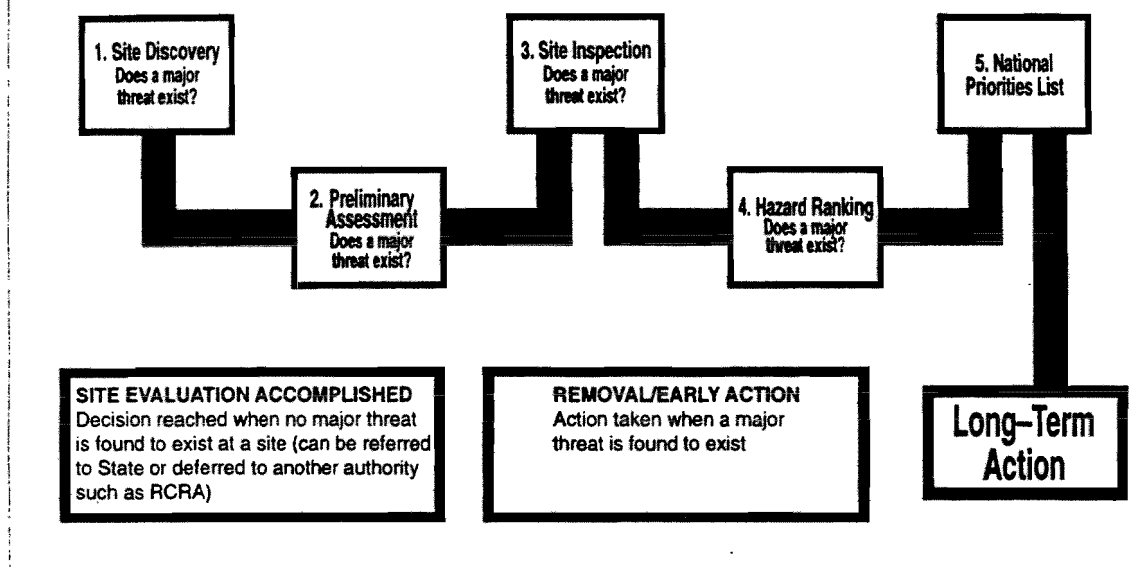
During the preliminary assessment, EPA or the State environmental agency:

- ◆ Reviews available background records;
- ◆ Determines the size of the site and the area around it;

- ◆ Tries to determine whether hazardous substances are involved;
- ◆ Identifies actual or potential pollution victims, such as the nearby population and sensitive environments;
- ◆ Makes phone calls or interviews people who may be familiar with the site; and
- ◆ Evaluates the need for early action using EPA's removal authority.

By gathering information and possibly visiting the site, EPA or the State environmental agency is able to determine if major threats exist and if cleanup is needed. Many times, the preliminary assessment indicates that no major threats exist.

The Site Assessment Process



However, if hazardous substances do pose an immediate threat, EPA quickly acts to address the threat. When a site presents an immediate danger to human health or the environment—for example, there is the potential for a fire or an explosion or the drinking water is contaminated as a result of hazardous substances leaking out of drums—EPA can move quickly to address site contamination. This action is called a *removal* or an *early action*. Additional information on early actions can be found on page 4.

EPA or the State environmental agency then decides if further Federal actions are required. Of the more than 35,000 sites discovered since 1980, only a small percentage have needed further remedial action under the Federal program.

A report is prepared at the completion of the preliminary assessment. The report includes a description of any hazardous substance release, the possible source of the release, whether the contamination could endanger people or the environment, and the pathways of the release. The information outlined in this report is formed into hypotheses that are tested if further investigation takes place. You can request a copy of this report once it becomes final—just send your name and address to your EPA regional Superfund office. See page 8 for further information on these contacts.

Sometimes it is difficult to tell if there is contamination at the site based on the initial information gathering. When this happens, EPA moves on to the next step of the site assessment, called the *site inspection*.

Making Polluters Pay

One of the major goals of the Superfund program is to have the responsible parties pay for or conduct remedial activities at hazardous waste sites. To accomplish this goal, EPA:

- ◆ Researches and determines who is responsible for contaminating the site;
- ◆ Issues an order requiring the private parties to perform cleanup actions with EPA oversight; and
- ◆ Recovers costs that EPA spends on site activities from the private parties.

Removals/Early Actions

EPA can take action quickly if hazardous substances pose an immediate threat to human health or the environment. These actions are called *removals* or *early actions* because EPA rapidly eliminates or reduces the risks at the site. EPA can take a number of actions to reduce risks, including:

- ◆ Fencing the site and posting warning signs to secure the site against trespassers;
- ◆ Removing, containing, or treating the source of the contamination;
- ◆ Providing homes and businesses with safe drinking water; and, as a last resort,
- ◆ Temporarily relocating residents away from site contamination.

"EPA can take action quickly if hazardous substances pose an immediate threat to human health or the environment."

3

Site Inspection

If the preliminary assessment shows that hazardous substances at the site may threaten residents or the environment, EPA performs a site inspection. During the site inspection, EPA or the State collects samples of the suspected hazardous substances in nearby soil and water. EPA may initiate a concurrent SI/remedial investigation at those sites that are most serious and determined early as requiring long-term action. Sometimes, wells have to be drilled to sample the ground water. Site inspectors may wear protective gear, including coveralls and respirators, to protect themselves against any hazardous substances present at the site. Samples collected during the site inspection are sent to a laboratory for analysis to help EPA answer many questions, such as:

- ◆ Are hazardous substances present at the site? If so, what are they, and approximately

how much of each substance is at the site?

- ◆ Have these hazardous substances been released into the environment? If so, when did the releases occur, and where did they originate?
- ◆ Have people been exposed to the hazardous substances? If so, how many people?
- ◆ Do these hazardous substances occur naturally in the immediate area of the site? At what concentrations?
- ◆ Have conditions at the site gotten worse since the preliminary assessment? If so, is an early action or removal needed? (See box above.)

Often, the site inspection indicates that there is no release of major contamination at the site, or that the hazardous substances are safely contained and have no possibility of being released into the environment. In these situations, EPA decides that no further Federal inspections or remedial actions are needed. This decision is referred to as *site evaluation accomplished*. (See page 5 for more details on the *site evaluation accomplished* decision.)

At the completion of the site inspection, a report is prepared. This report is available to the public—call your EPA regional Superfund office for a copy. See page 8 for the phone numbers of these offices.

"During the site inspection, EPA or the State collects samples of the suspected hazardous substances in nearby soil and water."

At sites with particularly complex conditions, EPA may need to perform a second SI to obtain legally defensible documentation of the releases.

Because EPA has limited resources, a method has been developed to rank the sites and set priorities throughout the nation. That method, known as the *Hazard Ranking System*, is the next step in the site assessment process.

4

Hazard Ranking System

EPA uses the information collected during the preliminary assessment and site inspection to evaluate the conditions at the site and determine the need for long-term remedial actions. When evaluating the seriousness of contamination at a site, EPA asks the following questions:

- ◆ Are people or sensitive environments, such as wetlands or endangered species, on or near the site?
- ◆ What is the toxic nature and volume of waste at the site?
- ◆ What is the possibility that a hazardous substance is in or will escape into ground water, surface water, air, or soil?

Based on answers to these questions, each site is given a score between zero and 100. Sites that score 28.5 or above move to the next step in the process: listing on the *National Priorities List*. Sites that score below 28.5 are referred to the State for further action.

5

National Priorities List

Sites that are listed on the *National Priorities List* present a potential threat to human health and the environment, and require further study to determine what, if any, remediation is necessary. EPA can pay for and conduct

Site Evaluation Accomplished

In many instances, site investigators find that potential sites do not warrant Federal action under the Superfund program. This conclusion can be attributed to one of two reasons:

- ◆ The contaminants present at the site do not pose a major threat to the local population or environment; or
- ◆ The site should be addressed by another Federal authority, such as EPA's Resource Conservation and Recovery Act (RCRA) hazardous waste management program.

When investigators reach this conclusion, the site evaluation is considered accomplished. A site can reach this point at several places during the site assessment process, namely at the conclusion of the preliminary assessment or the site inspection, or once the site is scored under the Hazard Ranking System.

remedial actions at NPL sites if the responsible parties are unable or unwilling to take action themselves. There are three ways a site can be listed on the National Priorities List:

- ◆ It scores 28.5 or above on the Hazard Ranking System;
- ◆ If the State where the site is located gives it top priority, the site is listed on the National Priorities List regardless of the HRS score; or
- ◆ EPA lists the site, regardless of its score, because all of the following are true about the site:
 - ▼ The Agency for Toxic Substances and Disease Registry (ATSDR), a group within the U.S. Public Health Service, issues a health advisory recommending that the local population be *dissociated* from the site (i.e., that the people be temporarily relocated or the immediate public health threat be removed);
 - ▼ EPA determines that the site poses a significant threat to human health; and
 - ▼ Conducting long-term remediation activities will be more effective than

addressing site contamination through early actions.

The list of proposed sites is published in the *Federal Register*, a publication of legal notices issued by Federal agencies. The community typically has 60 days to comment on the list. After considering all comments, EPA publishes a list of those sites that are officially on the National Priorities List. When a site is added to the National Priorities List, the site assessment is completed. Long-term actions take place during the next phase. See page 6 for more details on long-term actions.

As a Concerned Citizen, How Can I Help ?

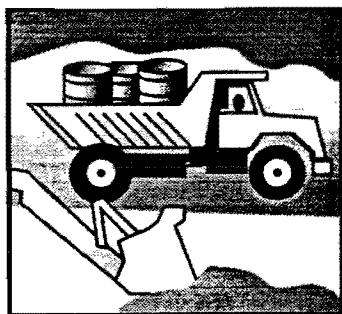
- ☛ Read this fact sheet.
- ☛ Call EPA with any potential sites in your area.
- ☛ Provide EPA with site information.
- ☛ Comment on proposed listing of sites on the National Priorities List.
- ☛ If the site is listed on the NPL, work with your citizens' group to apply for a technical assistance grant.



Addressing Sites in the Long Term

Once a site is placed on the National Priorities List, it enters the long-term or remedial phase. The stages of this phase include:

- ✓ Investigating to fully determine the nature and extent of contamination at the site, which can include a public health assessment done by the ATSDR;
- ✓ Exploring possible technologies to address site contamination;
- ✓ Selecting the appropriate technologies—also called remedies;
- ✓ Documenting the selected remedies in a record of decision (ROD);
- ✓ Designing and constructing the technologies associated with the selected remedies;
- ✓ If necessary, operating and maintaining the technologies for several years (e.g., long-term treatment of ground water) to ensure safety levels are reached; and
- ✓ Deleting the site from the National Priorities List, completing Superfund's process and mission.



Some Commonly Asked Questions

Q: What exactly is a site?

A: EPA designates the area in which contamination exists as the "site." Samples are taken to define the area of contamination. At any time during the cleanup process the site may be expanded if contamination is discovered to have spread further.

Q: How long will it take to find out if a threat exists?

A: Within one year of discovering the site, EPA must perform a preliminary assessment. The preliminary assessment allows EPA to determine if there is an immediate danger at the site; if so, EPA takes the proper precautions. You will be notified if you are in danger. EPA may also contact you to determine what you know about the site.

Q: What is the State's role in all these investigations?

A: The State can take the lead in investigating and addressing contamination. It also provides EPA with background information on (1) immediate threats to the population or environment, and (2) any parties that might be responsible for site contamination. The State shares in the cost of any long-term actions conducted by the Superfund program, comments on the proposal of sites to the National Priorities List, and concurs on the selected remedies and final deletion of sites from the National Priorities List.

Q: Why are private contractors used to assess sites?

A: EPA has a limited workforce. By using private contractors, EPA is able to investigate more sites. Also, EPA is able to draw on the expertise of private contracting companies.

Q: Why are there so many steps in the evaluation process? Why can't you just take away all the contaminated materials right now, just to be safe?

A: When EPA assesses a site, it first determines if contamination poses any threats to the health of the local population and the integrity of the environment. Dealing with worst sites first is one of Superfund's national goals. By evaluating contamination in a phased approach, EPA can quickly identify sites that pose the greatest threats and move them through the site assessment process. Once EPA understands the conditions present at a site, it searches for the remedy that will best protect public health and the environment. Cost is only one factor in weighing equally protective remedies. Many sites do not warrant actions because no major threat exists. However, if a significant threat does exist, EPA will take action.

about Superfund Sites

Q: If a site is added to the National Priorities List, how will we know when EPA has completed the cleanup efforts?

A: EPA notifies the public and requests their comments on the actions proposed to treat site contaminants. In addition, the community is notified when a site will be deleted from the National Priorities List. The entire process can take as long as 7 years; at sites where ground water is contaminated, it can take even longer.

Q: I live next door to a site and I see EPA and contractor personnel wearing "moon suits." Am I safe?

A: EPA and contractor personnel wear protective gear because they might actually be handling hazardous materials. Also, these people are regularly exposed to contaminants at different sites and do not always know what contaminants they are handling. EPA takes steps to protect the public from coming in contact with the site contamination. If a dangerous situation arises, you will be notified immediately.

Q: If a site is added to the National Priorities List, who pays for the activities?

A: EPA issues legal orders requiring the responsible parties to conduct site cleanup activities under EPA oversight. If the parties do not cooperate, Superfund pays and files suit for reimbursement from responsible parties. The sources of this fund are taxes on the chemical and oil industries; only a small fraction of the fund is generated by income tax dollars.

Q: How can I get more information on any health-related concerns?

A: Contact your EPA regional Superfund office for more information. The ATSDR also provides information to the public on the health effects of hazardous substances. Ask your EPA regional Superfund office for the phone number of the ATSDR office in your region.

Q: How can I verify your findings? What if I disagree with your conclusions?

A: You can request copies of the results of the site assessment by writing to your EPA regional Superfund office. The public is given the opportunity to comment on the proposal of a site to the National Priorities List and the actions EPA recommends be taken at the site. If a site in your community is listed on the National Priorities List, a local community group may receive grant funds from EPA to hire a technical advisor. Call your EPA regional Superfund office (see page 8) for the location of an information repository and for information on applying for a **technical assistance grant**.

Q: How can I get further information? How can I get a list of the sites EPA has investigated?

A: Contact your EPA regional Superfund office (see page 8) for more information and a list of sites in your area.

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Important Phone Numbers

For information on the Superfund program or to report a hazardous waste emergency, call the national numbers below.

U.S. EPA Headquarters Hazardous Site Evaluation Division

- ☐ Site Assessment Branch
703-603-8860

Federal Superfund Program Information

- ☐ EPA Superfund Hotline
800-424-9346

Emergency Numbers:

Hazardous Waste Emergencies

- ☐ National Response Center
800-424-8802

ATSDR Emergency Response Assistance

- ☐ Emergency Response Line
404-639-0615

For answers to site-specific questions and information on opportunities for public involvement, contact your region's Superfund community relations office.

EPA Region 1: Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont

- ☐ Superfund Community
Relations Section
617-565-2713

EPA Region 2: New Jersey, New York, Puerto Rico, Virgin Islands

- ☐ Superfund Community
Relations Branch
212-264-1407

EPA Region 3: Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia

- ☐ Superfund Community
Relations Branch
800-438-2474

EPA Region 4: Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee

- ☐ Superfund Site Assessment
Section
404-347-5065

EPA Region 5: Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin

- ☐ Office of Superfund
312-353-9773

EPA Region 6: Arkansas, Louisiana, New Mexico, Oklahoma, Texas

- ☐ Superfund Management
Branch, Information
Management Section
214-655-6718

EPA Region 7: Iowa, Kansas, Missouri, Nebraska

- ☐ Public Affairs Office
913-551-7003

EPA Region 8: Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming

- ☐ Superfund Community
Involvement Branch
303-294-1124

EPA Region 9: Arizona, California, Hawaii, Nevada, American Samoa, Guam

- ☐ Superfund Office of
Community Relations
800-231-3075

EPA Region 10: Alaska, Idaho, Oregon, Washington

- ☐ Superfund Community
Relations
206-553-2711